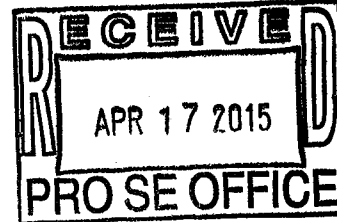


PRO SE INTAKE UNIT
United States District Court
Southern District of New York
U.S. Courthouse - 500 Pearl Street
New York, N.Y. 10007

4/17/15



Michael Spiegel,
Plaintiff
against

Case # 14 cv 3045 (LGS) (FM)

Erin Bekowies, et al.,
Defendants.

Letter re: Depositions scheduling

COPY TO: HON. FRANK MAAS

Dear Judge Maas,

On April 16, 2015, counsel for defense
gave me a letter (attached), addressed to
me, and copied to Your Honor.

I am now responding in the same
manner, with the attached letter to
counsel for defense, and with a
copy forwarded to you.

Truly yours,
Michael Spiegel
pro se Plaintiff

April 17, 2015

Carolyn Grimaldi
Greenwald Doherty LLP
30 Ramland Road, Suite 201
Orangeburg, NY 10962

Re: Spiegel v. Bekowies, et al.
Index No. 14-Civ.3045 (LGS)(FM)

Dear Ms. Grimaldi,

I am in receipt, by email, of your letter of April 16th, attached. There are some important details regarding the scheduling of depositions, as suggested in your letter, to which I disagree. Specifically:

1. The hours you suggest for the three depositions of May 15th, May 18th and May 26th, are approximations only, and can not be construed as the exact times for these depositions. That is because it is impossible to say exactly how long each deposition will take to complete. While I will conduct the depositions for each of these three days in the order of appearance that you provide, the subsequent deponents for each day will need to be at the courthouse earlier than the times you give, in case the preceding deposition finishes earlier. It is acceptable to me that the times be adjusted one hour earlier, to accommodate this.

Which means that on May 15th, that Mujovic needs to be ready to be deposed at 11:00 a.m., and not at 12:00 p.m., as you wrote. Then Shyu will be ready at 1:30 p.m. On May 18th, Valencia will be ready at 1:30 p.m. And on May 26th, Teixeira at 11:00 a.m. and Edgar at 1:30 p.m.

Please advise if you are in agreement to these modifications.

2. The depositions of Canavan on June 1st, and of Sefrankova on June 8th, each starting at 9:00 a.m., I consider to be firm dates, by Judge Maas' order. If there is any problem over these dates, you need to let me know by April 24, 2015. There is little flexibility left in scheduling depositions, and I want to depose these two individuals

after I depose the parties (with the exception of Bekowies, to accommodate her new employment situation).

Please keep in mind that for all the depositions, there can be no guarantee that all the depositions for a particular day will be completed on that day. Though I will do everything I can to make that happen, still, I can not compromise the quality of the depositions, so if necessary, a deposition may have to continue to another day.

3. Regarding my deposition on May 8th, I see that you have changed the deposition address from your offices in Orangeburg to a location on Third Avenue in New York City. Your Notice for Deposition, copy attached, shows the Orangeburg address. This is also the deposition address that Judge Maas ordered, at the recent telephone conference of April 12th. So I expect to be deposed in Orangeburg.

Yours truly,

A handwritten signature in black ink that reads "Michael Spiegel". The signature is fluid and cursive, with the first name "Michael" and last name "Spiegel" clearly legible.

Michael Spiegel
Pro Se Plaintiff
101 Cooper St, #1E
New York, NY 10034
212-568-3428

cc: Hon. Frank Maas

GREENWALD LLP**DOHERTY**
ATTORNEYS AT LAW30 Ramland Road Suite 201
Orangeburg, New York 10962
Tel: 845 589 9300
Fax: 845 638 2707

April 16, 2015

VIA Email and U.S. MailMichael Spiegel
101 Cooper Street, #1E
New York, NY 10034**Re: Spiegel v. Bekowies et al. Index Number: 14-cv-3045 (LGS)(FM)**

Dear Mr. Spiegel:

As you know, this office represents Defendants in the above-referenced matter.

Pursuant to the conference held before Judge Maas on April 14, 2015, please find below the schedule of depositions in this matter, as of today's date, for endorsement by Judge Maas. Unless otherwise stated, depositions will be conducted at the U.S. District Courthouse, 500 Pearl Street, New York, New York (room number(s) to be provided by Plaintiff).

May 8, 2015 (10:00 a.m.-5:00 p.m.): Deposition of Plaintiff, Michael Spiegel (Greenwald Doherty, LLP, 630 3rd Avenue, 15th Floor, New York, New York);

May 15, 2015

(9:00 a.m. – 11:30 a.m.) – Youssef Farah (Defendant)
(12:00 p.m. – 2:30 p.m.) – Shkurte Mujovic (Defendant)
(2:30 p.m. – 5:00 p.m.) – Michael Shyu (Defendant)

May 18, 2015

(9:00 a.m. – 2:00 p.m.) – Malgorzata Sowa (Defendant)
(2:30 p.m. – 5:00 p.m.) – Jorge Valencia (Defendant)

May 26, 2015

(9:00 a.m. – 11:30 a.m.) – Zenorina Gonzalez (Defendant)
(12:00 p.m. – 2:30 p.m.) – Ronaldo Teixeira (Defendant)
(2:30 p.m. – 5:00 p.m.) – Marla Edgar (Defendant)

630 Third Ave. 15th Floor
New York, NY 10017
TEL: 212.644.13101 Bridge Plaza N. Ste. 275
Fort Lee, NJ 07024
TEL: 201.862.9644263 Tresser Blvd. 9th Floor
Stamford, CT 06901
TEL: 203.328.75981650 Market Street 36th Fl
Philadelphia, PA 19103
TEL: 215.575.1180

June 1, 2015 (9:00 a.m. – 5:00 p.m.): Proposed for John Canavan (non-party) (subpoena to be served on Deponent by Plaintiff; date pending availability of Deponent)


June 8, 2015 (9:00 a.m. – 5:00 p.m.): Proposed for Katarina Sefrankova (non-party) (subpoena to be served on Deponent by Plaintiff; date pending availability of Deponent)

June 9, 2015 (9:00 a.m. – 5:00 p.m.): Erin Bekowies (Defendant).

Once you have confirmed the appropriate room number(s) for the depositions you will be conducting, please let us now.

Should you have any questions or concerns, please don't hesitate to contact us. Thank you for your attention.

Very truly yours,



Carolyn J. Grimaldi, Esq.

cc: Hon. Frank Maas (Via Facsimile (212) 805-6724))

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MICHAEL SPIEGEL,

Plaintiff,

v.

ERIN BEKOWIES, MICHAEL SHYU,
MALGORZATA SOWA, YOUSSEF
FARAH, SHKURTE MUJOVIC,
ZENORINA GONZALEZ, RONALDO
TEIXEIRA, JORGE VALENCIA, and
MARLA EDGAR,

Defendants.

Case No. 14 Civ. 3045 (LGS)(FM)

**NOTICE FOR DEPOSITION
PURSUANT TO FRCP 30**

PLEASE TAKE NOTICE that, pursuant to FRCP 30, the undersigned will take the deposition upon oral examination of, MICHAEL SPIEGEL, at Greenwald Doherty LLP, attorneys for the Defendants herein, located at 30 Ramland Road, Suite 201, Orangeburg, New York, 10962, before a notary public, court reporter, videographer or other such officer authorized to take depositions, which will be recorded by stenographic and/or videographic means, commencing at 10:00 A.M. on May 8, 2015, and continuing from day to day until completed.

Dated: Orangeburg, New York
April 13, 2015

GREENWALD DOHERTY LLP

By: 

Carolyn J. Grimaldi, Esq. (CJP613)
Kevin M. Doherty, Esq. (KD3492)

30 Ramland Road, Suite 201
Orangeburg, New York 10962
Phone: 845-589-9300
Facsimile: 845-638-2707
CG@GreenwaldLLP.com
KD@GgreenwaldLLP.com
Attorneys for the Defendants

To: Michael Spiegel
101 Cooper Street, #1E
New York, New York 10034
Email: michaelspiegel0@lycos.com; spiegeltheresa@aol.com